

BILL LOCKYER
Attorney General of the State of California
MIGUEL A. NERI
FIEL D. TIGNO
Supervising Deputy Attorneys General
State Bar No. 161195
1515 Clay Street, Suite 2000
P.O. Box 70550
Oakland, CA 94612-0550
Telephone: (510) 622-2204
Fax: (510) 622-2270

Attorneys for Defendants,
California Department of Corrections, Edward S.
Alameida, Jr., and Jeanne S. Woodford

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

KATHY DEOCAMPO,

Plaintiff,

v.

**CALIFORNIA DEPARTMENT OF
CORRECTIONS, EDWARD S. ALAMEIDA,
JR., JEANNE S. WOODFORD, AND
DOES 1-25 Inclusive,**

Defendants.

Case No.: C 04-3018 MMC

**STIPULATION REQUESTING
ADDITIONAL 35-DAY
CONTINUANCE OF CASE
MANAGEMENT CONFERENCE;
ORDER THEREON**

Pursuant to the Court's Order and Civil L.R. 16-9, the parties jointly submit this Stipulation requesting a 35-day continuance of the Case Management Conference on the ground that the parties are in currently in the process of negotiating in good faith to reach a global settlement of all of plaintiff's claims.

DESCRIPTION OF THE CASE AND PROCEDURAL HISTORY

Plaintiff, Kathy DeoCampo, is an employee of the California Department of Corrections in the job position of Correctional Case Records Analyst at San Quentin State Prison. She filed this instant lawsuit on July 26, 2004, alleging retaliation under Title VII, 42 U.S.C. section 2000(e), retaliation for First Amendment activities under 42 U.S.C. section 1983, and pendent claims under California

Government Code section 12940, *et seq.* Defendants answered the complaint on August 18, 2004.

Plaintiff also filed related Workers' Compensation claims that are pending before the California Workers' Compensation Appeals Board. Because the parties agreed to enter into settlement negotiations to attempt to reach a global settlement of all of plaintiff's claims, the parties requested that this Court continue the previously scheduled Case Management Conference that had been set for April 15, 2005. The Court issued an order continuing the Case Management Conference to May 20, 2005. After the parties advised the Court that they met on May 10, 2005 and are discussing the possible terms for a global settlement of plaintiff's claims, the Court continued the Case Management Conference to June 24, 2005. However, the parties are still engaging in good faith negotiations to reach a settlement of plaintiff's claims, and therefore, respectfully request that the Court grant an additional thirty-five days continuance of the Case Management Conference.

STIPULATION

Given that the parties are currently engaged in good faith negotiations, the parties respectfully request that this Court grant an additional 35-day continuance of the Case Management Conference.

RESPECTFULLY SUBMITTED,

**BILL LOCKYER, Attorney General
of the State of California,
MIGUEL A. NERI, Supervising
Deputy Attorney General,**

Dated: June 20, 2005

**/S/ Fiel D. Tigno
FIEL D. TIGNO
Deputy Attorney General
ATTORNEY FOR DEFENDANTS**

THE SCOTT LAW FIRM

Dated: June 18, 2005

**/S/ John Houston Scott
JOHN HOUSTON SCOTT
ATTORNEY FOR PLAINTIFF**

ORDER

Having considered the parties' stipulation and finding good cause in support thereof, the stipulation is hereby approved and the Case Management Conference set for June 24, 2005 shall be continued to August 12, 2005, at 10:30 a.m. A joint case management conference statement shall be filed no later than August 5, 2005.

IT IS SO ORDERED.

Dated: June 21, 2005

/s/ Maxine M. Chesney
The Honorable Maxine M. Chesney
United States District Judge